To: Robert Law[rlaw@demaximis.com]
Cc: Nace, Charles[Nace.Charles@epa.gov]
From: Vaughn, Stephanie
Sent: Thur 5/21/2015 7:00:52 PM
Subject: BERA, discussion of comments
heron bass from nydec.jpg
heron bass.jpg
heron carp.jpg
heron carp2.jpg

Hi Rob,

Here is guidance on some of the comments we have already discussed. Please let me know if you have any questions.

Thanks,

Stephanie

1. Carp (Comments 147, 204 and others)

The CPG asked for examples of sites where carp were evaluated in a BERA. Our initial search for information found the following sites included carp in their risk assessments:

Fox River

Tittabawassee River

Portland Harbor

Kalamazoo River

Also attached are some pictures of herons eating carp and other large fish.

2. Comments 153 and 155 – In general, the PFD lists assessment endpoints for the BERA, not the SLERA. The endpoints for the SLERA should be more generic, similar to the receptors presented in the CSM. To address these comments specifically, please remove Table 1-2, combine Tables 1-2 and 1-3, and remove references to the BERA in this new combined table.

3. Comment 156d – The point of this comment was that in the SLERA, the most conservative value for sediment should be used, regardless of the receptor for which it is related. As long as the most conservative value is used for both plants and other receptor groups for sediment, it is okay to have multiple sediment screening in the SLERA.

4. Comment 162 – An "x" is required in the sediment chemistry column for benthic omnivorous fish, invertivorous fish, piscivorous fish, sediment-probing invertivorous birds, piscovous mammals and amphibians/reptiles. This is consistent with Figures 5-1 through 5-3 of the PFD

5. Comment 209 – see response above to 156d.

6. Comments 149 and 159 – We are asking for the hazard quotients for either individuals of a chemical group (like all PAHs, or dioxins) to be summed and for all compounds that have the same mode of action to be summed. This is a conservative approach that makes sense for the SLERA. The only exceptions would be if there is a total screening value and screening values for individual chemicals, in that case a sum would not be needed, but it would still be good to show it as a confirmation on how the two values match up.

7. Comment 166 – Please evaluate each mudflat separately in the BERA. Table 8-5 can be updated with the following information, with the calculated risks and discussion mirroring what is in the table. A section (or table) should also be added that describes each individual mudflat (size, grain size, description).

Focal Species	Exposure Area		
	Prey	Sediment	Surface Water

Spotted Sandpiper	Individual mudflats	>RM 8	
	Mudflats by zone (estuarine, transition, freshwater)	Mudflats by zone (estuarine, transition, freshwater)	>RM 8
	Site-wide	Site-wide	>RM 8
Great Blue Heron	Individual mudflats	Individual mudflats	>RM 8
	Mudflats by zone (estuarine, transition, freshwater)	Mudflats by zone (estuarine, transition, freshwater)	>RM 8
	Site-wide	Site-wide	>RM 8
Belted Kingfisher	Individual mudflats >RM6	Individual mudflats >RM 6	>RM 8
	Mudflats by zone (transition, freshwater)	Mudflats by zone (transition, freshwater)	>RM 8
	Site-wide	Site-wide >RM 6	>RM 8